

Application/Control Number: 09/847,720
Art Unit: 2142

Docket No.: PALM-3629.US.PSI

REMARKS

Reconsideration and allowance are respectfully requested in view of the following remarks.

Claims 1-27 remain pending. All claims are as originally filed.

Rejection of Claims 1-27

On page 2 of the Final Office Action of March 29, 2005, the Examiner rejected claims 1-27 under 35 U.S.C. 102(b) as allegedly being anticipated by U.S. Patent No. 5,606,596 to Jain et al. ("Jain"). Applicants respectfully traverse the rejection of all claims.

Independent claim 1 is directed to a method of establishing one of a group of network links on a computer system. The method includes associating one or more alternative network links with one or more of the network links, requesting a first network link of the group of network links, initiating the first network link, determining whether a particular alternative network link designation is associated with the first network link, and if the initiating of the first network link fails to establish the first network link and if the particular alternative network designation is associated with the first network link, initiating a particular network link of the group of network links based on the particular alternative network link designation. Applicants submit that Jain fails to disclose or suggest each and every of claim 1.

Jain teaches a method and a system for locating mobile users in a personal communication system (PCS). Fig. 1 of Jain shows an exemplary network configuration. Jain discloses at least two methods for locating mobile users, per-user location caching and per-user forwarding (Jain, at col. 2, lines 56-61).

Typically, when a user moves from one Registration Area (RA) to another, a Home Location Register (HLR) is updated to include the user's current location (see Jain, at col. 6, lines 18-19). With respect to the per-user location caching method of Jain, when a user's

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location is found, the user's location is stored in a memory, called a cache, at a RA of a calling user, for example, RA i (see Jain, at col. 6, lines 19-23). A subsequent call from a calling user in RA i to the same called user will cause the cache at RA i to be read. If the called user's location is found in the cache (a cache hit) and indicates the called user's location as, for example, RA j, then a Visitor Location Register (VLR) at j is queried. If the called user is still located in RA j, then the VLR at j returns enough information to route the call to the called user. If either the called user's location is not in the cache, or the VLR at j does not have the called user's location information, then the called user's HLR will be queried for the called user's location information (known as the basic strategy) (see Jain, at col. 6, lines 24-27).

With respect to the per-user forwarding, when a mobile user moves from RA a to RA b, the user's equipment informs the switch at RA b that it arrived from RA a (see Jain, at col. 10, lines 23-25). Switch b then exchanges messages with switch a such that a forwarding pointer from a to b is set up without invoking the user's HLR (see Jain, at col. 10, lines 29-31). A subsequent call from a calling user via another switch to the same user (called user) will cause the called user's HLR to be queried for location information and, as a result, the HLR will return an out-of-date pointer to RA a (see Jain, at col. 10, lines 31-33). The pointer from a to b will then be followed to determine the correct location (see Jain, at col. 10, lines 33-35).

Applicants wish to point out that the process of obtaining location information about the user has absolutely nothing to do with failure of a network link. For example, with respect to the per-user location caching method, when a call is made and the called user's location information cannot be found in the cache at the RA of the calling user, this is not a network link failure. In fact, a connection for obtaining data from the cache of the RA was successful. Instead, what occurred was only a failed attempt to obtain the called user's location via the cache because the information was no longer located in the cache. The

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called user's location may still be obtained by querying the called user's HLR. Once, the called user's location information is obtained, the call can then be established to the called user.

On page 2 of the Office Action, the Examiner alleged that Jain, at col. 2, lines 64-67, discloses associating one or more alternative network link designations with one or more of the network links. Applicants disagree.

Jain, at col. 2, lines 62-67, discloses:

In carrying out the above objects and other objects of the present invention a method is provided for locating nomadic users in a Personal Communication Services (PCS) system having a plurality of registration areas wherein each user is identified with a home database and each registration area is identified with a visiting database.

As previously discussed, mobile users may move from one RA to another RA. The above-cited portion of Jain refers a method for locating mobile users in a PCS system that has multiple RAs. Each user is identified or associated with a home database (HLR) and each RA is identified or associated with a visiting database (VLR). Applicant submits that this portion, or any other portion of Jain fails to disclose or suggest alternative network link designations. A user being associated with an HLR is not equivalent to a network link designation being associated with a network link. The user is neither a network link designation nor a network link. The HLR refers to a database and is also not a network link designation or a network link. Further, a RA being associated with a VLR is not equivalent to a network link designation being associated with a network link. A RA is an area served by one switch and is comprised of one or more radio port coverage areas or cells (see Jain, at col. 5, lines 26-28). A VLR is a database. Thus, Jain fails to disclose or suggest associating one or more alternative network link designations with one or more of the network links, as required by claim 1.

On page 2 of the Office Action, the Examiner alleged that Jain, at col. 6, line 8, discloses requesting a first network link of the group of network links. Applicants disagree.

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Jain, at col. 6, lines 7-11, discloses:

For simplicity, it is assumed that message sizes are equal for different types of transactions (e.g., location request, registration and deregistration), for both query and update invocations as well as their associated response messages.

Thus, Jain discloses different types of transactions including location request, registration and deregistration. Obviously, a location request concerns making a request to determine the location of a user. Registration refers to updating the HLR regarding a user's location information (see Jain, at col. 2, lines 30-31). Deregistration refers to informing a VLR of a RA from which a user has moved to delete information about the user. Applicants submit that this portion of Jain has nothing to do with requesting a first network link of the group of network links, as required by claim 1.

On page 2 of the Office Action, the Examiner alleged that Jain, at col. 3, lines 1-2, discloses initiating the first network link. Applicants disagree.

Jain at col. 2, line 67 through col. 3, line 3, discloses:

The method includes the step of collecting data based on the user's location in a first registration area obtained during a first PCS call to the user from a second registration area.

Thus, Jain discloses that a first PCS call was made to a user from another RA. In order for the user to be called, the user's location information must first be obtained. The location information obtained during the first PCS call may be saved or collected. The above-cited portion of Jain says nothing about initiating a first network link, as required by claim 1.

On page 2 of the Office Action, the Examiner alleged that Jain discloses, at col. 3, lines 8-10, determining whether a particular alternative network link designation is associated with the first network link. Applicants disagree.

As mentioned above, the cited portion of Jain discloses different types of transactions including location request, registration and deregistration. A location request concerns

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making a request to determine the location of a user. Registration refers to updating the HLR regarding a user's location information (see Jain, at col. 2, lines 30-31). Deregistration refers to informing a VLR of a RA from which a user has moved to delete information about the user. Applicants submit that this portion of Jain has nothing to do with determining whether a particular alternative network link designation is associated with the first network link, as required by claim 1. This portion of Jain refers to transactions for keeping location information of a user up-to-date. Applicants further submit that no portion of Jain discloses or suggests determining whether a particular alternative network link designation is associated with the first network link, as required by claim 1.

On page 2 of the Office Action, the Examiner alleged that Jain, at col. 3, lines 9-11, discloses that if the initiating of the first network link fails to establish the first network link and if the particular alternative network designation is associated with the first network link, initiating a particular network link of the group of network links based on the particular alternative network link designation, as required by claim 1. Applicants disagree.

As mentioned above, the cited portion of Jain discloses different types of transactions including location request, registration and deregistration. This portion of Jain refers to transactions for keeping location information of a user up-to-date. This portion of Jain, as well any other portion of Jain, is completely silent regarding the above-mentioned feature required by claim 1.

Because Jain fails to disclose or suggest each and every feature required by claim 1, Applicants submit that claim 1 is not anticipated by Jain and respectfully request that the rejection of claim 1 be withdrawn.

Claims 2-7 depend from claim 1 and are not anticipated by Jain for at least the reasons discussed with respect to claim 1. Therefore, Applicants respectfully request that the rejection of claims 2-7 be withdrawn.

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Independent claims 8, 15 and 22 recite features similar to those of claim 1 and are not anticipated by Jain for at least reasons similar to those provided with respect to claim 1. Therefore, Applicants respectfully request that the rejection of claims 8, 15 and 22 be withdrawn.

Claims 9-14, 16-21 and 23-27 depend from one of claims 8, 15 or 22 and are patentable for the reasons discussed above with respect to claims 8, 15 and 22. Therefore, Applicants respectfully request that the rejection of claims 9-14, 16-21 and 23-27 be withdrawn.

CONCLUSION

Having addressed all rejections, Applicants respectfully submit that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

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